

DECLARATION OF SHELLI S. SCHADE, LMSW, DAPA

I, Shelli S. Schade, LMSW, DAPA hereby state as follows:

1. I have been appointed by the court as a Mitigation Specialist for the defense in TROY CLARK vs. DOUG DRETKE, Director Texas Department of Criminal Justice, Correctional Institutional Division. I am a Licensed Master Social Worker duly licensed to practice in the state of Texas since 1999 and a Diplomate of the American Psychotherapy Association. I am a member of the National Association of Forensic Social Workers, National Association of Social Workers, National Association of Sentencing Advocates, National Association of Criminal Defense Lawyers and the Texas Criminal Defense Lawyers Association.
2. I currently provide mitigation investigations throughout Texas, where I have been an independent contractor since 1999. I have attended numerous CLE-approved training seminars sponsored by the Texas Defender Service, Texas Criminal Defense Lawyers Association, National Association of Criminal Defense Trial Lawyers and the Administrative Office of the United States Courts. From 1994 to 1995, I was employed by Timberlawn Mental Health Systems and provided direct care and counseling to clients suffering from substance abuse and/or psychiatric disorders. The New Place employed me part-time in 1999 where I provided counseling to court-ordered adolescents at the Collin County Juvenile Detention Center. In 2001, I was employed by Sequoyah Enterprises as the Clinical Director. This involved working with Dallas County at-risk juveniles court-ordered for treatment. I facilitated groups, individual and family counseling. In 2000, I began working for the Nexus Recovery Center as the Program Director of the Adolescent Unit. This involved the overall management of the program as well as providing individual, group and family sessions. In 1999, I completed the training for Family Mediation Training in order to become a Qualified Texas Family Court Mediator. I have been an independent contractor/owner for Forensic Social Work Consultants since 1999 providing forensic based services. In 2001, I completed Instructor/Administrator training for the Texas Alcohol Education Program for Minors. In 2000, I began employment at Medical Center at Terrell as

a hospital wide social worker. I provided crisis intervention for all patients in the event of terminal illness/sudden death, sexual assault, rape, domestic violence and abuse/neglect for both children and adults. In 2003, I completed the Administrator/Instructor training for the Texas Drug Offender Education Program. Additionally, I have conducted assessments for determining appropriate placement for patients seeking emergency treatment for mental illness and substance abuse on both the voluntary and involuntary basis.

3. I have been asked by attorneys for Troy Clark to present the educational, psychological, medical, institutional, cultural and social history of Troy and his family in order to discuss the effects of these factors on his development and behavior. In my investigation of Mr. Clark's social history and other mitigating factors, I have followed the standard of care required by mental health and medical professionals in forming a professional opinion.
4. In reaching my professional opinion, I conducted a number of interviews of Troy on Death Row, conducted multiple interviews with members of Troy's immediate and extended family. I reviewed documentary evidence concerning Troy's education, employment, medical, psychological and psychiatric history as well as facts relevant to this crime. The materials I reviewed are listed in the Appendix attached to this declaration.

Note: This social history report is preliminary in nature and reflects results of the social history investigation conducted to date. The investigation is not complete at this time. Work remains to be done including review of records, which have been requested but not yet received.

Introduction

A unique set of factors contributed to Troy's social functioning, intellectual development and behavior. These factors which all have mental health consequences include:

- a) Troy was born in 1967 to a single Caucasian-American mother living in San Antonio, Texas. Their culture and debilitating effects of chronic poverty shaped

the family's patterns of behavior. Troy's grandparents, parents and siblings worked hard as farm hands and common laborers but despite their best effort and determination, were never able to earn enough to escape poverty.

- b) Strong family-centered traditions that were passed down from one generation to the next determined many of Troy and his family's responses to education, employment, illness and threat to family integrity.
- c) Throughout his life, Troy endured constant exposure to drugs, alcohol, criminal activity and violence. He often witnessed violence against his mother from many male partners. During his early childhood, he witnessed a neighbor girl die from a stabbing. He would later experience the suicide of his brother, the one stable person in his life. Troy learned early on that violence was part of life that he was not immune to.
- d) Troy was born with a cleft palate, which caused a severe speech impediment that resulted in constant teasing and harassment from family and friends. The cleft could have been a result of the daily alcohol consumption of his mother during her pregnancy, as well as in-utero exposure to illegal drugs. Troy also suffered from severe ear infections, without medical attention, that contributed to life long hearing issues.
- e) Troy experienced transition and mobility issues as a result of numerous changes in residential settings throughout his life. His mother was in prison for most of Troy's life and his maternal grandmother would often leave Troy and his brother at various family members homes for long periods of time. At an early age, Troy experienced low parental involvement and was often left alone to care for himself. Troy was never able to form the proper attachment with his parents that are needed for full brain development.
- f) Depressive illness and addictive disease prevented Troy's mother and family from identifying, understanding, and responding appropriately to their children's psychological and physical needs. Both of these disorders have a genetic or biological underpinning, thus leaving family members vulnerable.
- g) Troy began using drugs and engaging in petty criminal behavior at the age of ten. By age fifteen, he was supporting himself solely through criminal activity.

- Intervention from community resources were never sought and Troy learned from this and older family relatives that criminal activity and drug abuse were acceptable ways to deal with their impoverished environment.
- h) Troy did not complete school and left the educational system after the middle of the seventh grade. This lack of education would contribute to Troy's inability to find a job that would provide him an opportunity to escape poverty without it involving criminal activity. He would not receive his GED until a later stay in prison.
 - i) After his mother's first imprisonment, Troy's environment became one of extreme poverty, overcrowding and limited adult supervision. This would last until he finally left home at age fifteen to be on his own.
 - j) The prevalence of alcoholism and drug addiction in Troy's family is remarkable and widespread. Alcoholism contributed to the chronic and pervasive interpersonal violence, poverty, chaos, and rejection that characterized Troy's early life and potentiated other stressors he faced.
 - k) Troy's intoxication and addictive disease were the direct consequence of a devastating accumulation of risks that shaped his development and behavior. As a child, Troy had to contend with multiple risks: family mental illness, abandonment, family addictive and neurological disease, poverty, and life threatening danger at home and in the community. Each alone constituted a significant obstacle to healthy development, but in combination they resulted in serious emotional problems and mental impairments.
 - l) Troy was severely traumatized by the chronic violence he was subjected to, by the physical and sexual assaults against his mother that he witnessed and was powerless to stop, and by multiple abandonment's by his attachment figures. The absence of compensatory or protective forces in Troy's life exacerbated the long-term consequences of the trauma.
 - m) Troy has demonstrated a remarkably satisfactory adjustment to incarceration in prison and does not constitute a threat to prison staff or other inmates. He respects authority, follows the rules of the institution and has had no disciplinary actions taken against him since incarceration.

Paternal Family

Most of the history of Troy's paternal family is limited and is passed down from anecdotes and family lore passed down from generation to generation rather than from documents. As croppers and day laborers, the family had little education and did not keep extensive family records. School records, normally available to shed light on individuals' behavior and intellectual functioning, often were not maintained or found. Troy did not meet his biological father until the age of seventeen and had only met his grandfather once at the gas station he owned in Oregon. Troy claims to have never met his paternal grandmother and could not recall any information regarding her. Both paternal grandparents are now deceased and Troy's father would not participate with the mitigation investigation in order to gather additional information. Troy's father, Wilburn and mother, Cleta were first cousins and apparently when Cleta became pregnant there was shame brought on the family so Wilburn left Oregon and communication between Cleta and Wilburn was scarce if any after that. Troy's half siblings did reveal that Wilburn was somewhat embarrassed by the actions of his family and left the home as soon as he could to begin a life in another state. According to Sharmalee, Troy's half sister with his father, "Dad's family was a pretty bad clan" always-in trouble and he didn't want to turn out like them so he left. Chuck recalls hearing his father talk about how Cleta was from the "bad side of the family" and so he thought by leaving Oregon he could make a fresh start. Cleta was pregnant with Troy when Wilburn left for Texas in 1967 and to this day, according to his children, Wilburn has doubts that Troy is indeed his child. Once Wilburn left the family he met a lady named Treva Janet. They have been married for 38 years, have two children and currently live in the Mississippi area

Maternal Family

Troy's maternal family history is relevant to understanding his psychological make up because his mother's abuse history, cultural beliefs, and genetic heritage found expression in the manner in which she reared Troy and his siblings. Rosella Faulkner was

born in 1904 and married Ray Faulkner in 1920 after becoming pregnant with her first child Thelma. Rosella was fifteen and Roy was eighteen. They would remain married for over twenty years and Rosella would bear twelve children; Thelma, Ray, Fay, Odis, Ethel, Verda, Wanda, Roy, Edna, T.W., Rosi and Cleta (Troy's mother). Three months after the youngest child, Cleta was born Mr. Faulkner would die from cancer. Cleta would spend much of her life searching for the father she didn't have through many tumultuous relationships with older men.

Rosella became a widow at forty-five years old with twelve children to raise on her own. The family would struggle daily to survive often relying on either government assistance or the ability of the children to work and help out. While working farmland to help the family Odis, the fourth oldest, would meet a man named Roy Hattaway (who had served time in prison for murder). The children remember hearing stories about his life at Alcatraz and Angola prisons. He had served 10 years at Alcatraz but once "the escapes" occurred, he and other inmates were sent to Angola to complete their sentences. Roy would serve an additional 12 years at Angola and then move to the Oregon area where he would meet the family he would eventually claim as his own. Rosella and Mr. Hattaway would remain together (though never married) until their deaths some years later.

The children remember Rosella being a strict disciplinarian growing up. They weren't sure if it was because she was so overwhelmed with twelve children or if she "just didn't know any better". She was known to be harsh, unloving and at times cruel. Descriptions of Rosella's behavior and appearance are consistent with lay witness accounts of people with major depression. Underlying Rosella's cruel behavior were agitation and irritability, common symptoms of depression. She was a person without joy who expressed no happiness or love, even for her children. Troy recalls never hearing her say thank you or I love you to anyone. Cleta recalled that she always had the same mean expression on her face, so it was hard to tell if she was angry or not until she hit you. Even Roy, who had spent over twenty years in prison, knew not to make her mad or go against her because she would retaliate. Roy would often drink to deal with the pressures of being with Rosella but he would never leave her.

Of the twelve children from Rosella, six remain alive today. Fay, T.W., Thelma, Verda, Edna and Ethel have passed away from a combination of factors. Most of the deaths were the result of cancer, however alcoholism and drug use was suspected as underlying issues as well. Although all the siblings eventually married and had children, several of the sisters at a young age would engage in prostitution as a way of life. Cleta recalls hanging out at the truck stops near where they lived when she was younger and noticing that the men who came in would flirt with her. She recalls liking the attention she received and eventually began using the truck stop as a way to support her self. It was during this time that her drug use began to become a problem for her. Cleta, who was the youngest, doesn't recall a lot of memories from her older siblings. She would count on them however, to help raise her children while she served several prison sentences over the years for drugs and prostitution.

Family of Origin

Cleta recalls a conversation she had with her uncle, W.B. her mother's brother, when she was around fourteen. She recalls that W.B. and her mother, Rosella were feuding. She states that W.B. tried to get her and his son, Wilburn together in order to "get back at" Rosella for something. W.B. apparently tried fairly hard to convince his son, Wilburn, that Cleta would be "fun" to be around. Once Cleta learned at age sixteen she had become pregnant with Wilburn's child, the family no longer seemed to support the idea of Wilburn and Cleta being together since they were "first cousins". Everyone appeared okay that they were engaging in teenage sex, no one however wanted a child to result from it.

Shortly after Cleta revealed her pregnancy, Wilburn decided to try and distance himself from the family. Cleta would give birth to her first child, Wilburn C. Clark on June 9, 1965 (Clyde). Since Wilburn was too young to move away, he would remain in Oregon until his eighteenth birthday. Cleta was still involved in petty prostitution and drug use and become involved with a few men that began a long history of abusive relationships

with her. Cleta claims that even though Wilburn had stated that he did not want to be involved with her anymore, they apparently had several more sexual encounters over the next few years. The result was that she became pregnant again. Although Wilburn denied paternity to her second child, no paternity testing was ever done to verify the true identity of the birth father. Wilburn would leave Oregon while she was pregnant with Troy and would have no contact with Cleta or the two boys for many years.

In 1967, Cleta moved with her mother and Roy to Texas for work. It was there that she was arrested for her first drug charge and was sent to jail. She was pregnant with Troy at the time and remembers being so hot in jail that she would "wet towels to put on her head and they would sour from the heat". She spent several months in jail before returning to a small trailer with her mother and Roy. Cleta had met a man in jail named Holbert and so once he was released, he would join Cleta and her family. Holbert was "quite the drinker" according to family. He was both physically and emotional abuse to Cleta as well. Despite being pregnant, Cleta recalls drinking daily throughout her pregnancy. She claims to have drunk beer, whisky, vodka whatever she could get. She also admitted to occasional marijuana and "Bennies" (stimulants). She thinks it might have had something to do with "just trying to deal with Holbert's wrath". Cleta claims to have had no pre-natal care for either of her pregnancies and doesn't recall being that excited about having a second. Clyde was barely a year and a half old and grandma Rosella had already spent the majority of time raising him because of Cleta's jail stay and continued alcohol/drug use.

On September 2, 1967 Troy J. Clark was born in San Antonio Texas. It was not your typical exciting delivery since the reason Cleta delivered was that she had gotten drunk at a local bar, beat up and was thrown off the bar stool and by Holbert which prompted her labor. She would be intoxicated at the time of delivery. Records would be requested from Robert B. Green Hospital in San Antonio but the hospital indicated that newborn records are only kept for twenty years and that we had missed the deadline. Had the records been available, APGAR scores, complications, etc could have been reviewed and documented. Troy was born with a cleft palate. Although this defect is generally attributed to genetics,

there is one known predictor; alcohol. It is also suspected that Troy was born with Fetal Alcohol Syndrome, which produces many long-term health and psychological problems. Some of which are: low intelligence, mental retardation, behavioral hyperactivity, small cheekbones, deficits in IQ, learning problems, memory problems, speech and language problems and adolescent antisocial behavior. In reviewing some of these problems, Troy would exhibit most of them throughout his childhood, adolescence and adulthood. Cleta admitted to occasional use of marijuana and stimulants throughout her pregnancy and this presents another set of life long complications the fetus may suffer as a result. These are: prematurity, low birth weight, infections, small head size, birth defects, stunted growth, poor motor skills, learning disabilities and neurological problems. The serotonin "system" can be damaged in utero as well. There is significant evidence that exposure to the unborn fetus to alcohol, cocaine, and inescapable fear (in cases of severe domestic violence) can have devastating developmental effects. Postnatal traumas can overwhelm the serotonin system resulting in Post Traumatic Stress Disorder (PTSD) that are frequently misdiagnosed as Attention-Deficit/Hyperactivity Disorder (ADHD). Lack of impulse control (disruptive behavior) observed in pre-K and kindergarten is often an antecedent of early alcohol/drug abuse and aggressive behavior.

Shortly after Troy's birth in San Antonio, Cleta would be arrested again. She couldn't recall what she had been arrested for since she's "been arrested for everything". She does however remember that on Troy's first birthday she was incarcerated. This would be the beginning of many incarcerations throughout Troy's childhood. Grandma Rosella would raise Troy and his brother Clyde for the most part but other family members would eventually share the responsibility of the boys over the years. It was during this time in Texas that Rosella met Roy Hattaway and he would play a role in the boys' life as well.

While Cleta was incarcerated, the family moved to Whitehouse, Texas where Troy and Clyde attended Kindergarten and First grade. It was during this time that Troy began being teased for his hygiene. Grandma had never told them to brush their teeth so when in kindergarten there was a lesson in "brushing your teeth" Troy remembers being embarrassed that he didn't have a toothbrush and had been coming to school with dirty

teeth. He was also embarrassed that he really had no clothes or proper shoes and that he and Clyde would often share so that they didn't have to wear the same thing two days in a row. Troy remembers at one point his grandma making him a pair of shoes out of cardboard and duct tape. He recalled how bad it would hurt when he would take the tape off at night. Sometimes he would just leave them on rather than going through the pain of taking them off.

The move to Whitehouse would be the first of many moves over Troy's childhood. Due to Troy's cleft from birth, he had a difficult time learning to speak. Troy often felt that grandma and Clyde were the only one's who could understand him. When he did begin to speak, it sounded as though he was "talking through his nose" which became an embarrassing trait for Troy. He remembers the kids "always making fun of him for how he talked" and how they would tell him he was stupid and retarded. Troy remembers that this was what prompted him to become a "bully" so that other people would quit making fun of him. Apparently the family chose not to have surgery on Troy's cleft until sometime later, subjecting him to ridicule at the most crucial stages of development. Troy was never told about having a cleft until much later in life. He was always under the impression that he had been born with "a hole in his throat" and only later as an adult did he learn the truth.

Between Troy getting in trouble for fighting at school and grandma looking for ways to make money, the family would begin a regular series of moves. Troy would finish second grade in Whitehouse, Texas and then in 1974 the family would move to Independence Oregon. There Troy would not only attend two different schools for the third grade but he would begin shifting from one family to another while mother remained in prison and grandma just "tried to get by". Troy would have to take speech and special education classes until the third grade. It wasn't clear if he stopped taking the classes because he had progressed or if it was because after the third grade, there would be times he would spend days, weeks or a month at one school and then move again so assessment on the part of the schools would be difficult. Both of the schools that Troy attended in Oregon were made up of mostly minority students and 74% of the children received free or

reduced fee school lunches. This was a poor community and Troy remembers being so hungry at times that he would "cry himself to sleep at night". Records were either non-existent or were very difficult to gather because grandma and other family members that enrolled Troy in school often misspelled his name or used incorrect social security numbers.

It was in Oregon that Troy recalls living in a 'little shack' across the street from a local minister. The minister had come to ask if Troy and Clyde would like to attend a church group. Grandma had been making Troy shoes out of duct tape and so she informed the minister that she didn't mind if the boys attended but that Troy didn't have any shoes to attend church. Troy remembers the minister returning shortly with a pair of shoes for Troy and he was so proud to have a pair of shoes that the other kids wouldn't make fun of. He remembers wearing them "till they fell apart". Aunt Verda and her husband Nick would take the two boys in for the last six months of their stay in Oregon and Troy's second school for third grade.

Troy wasn't really sure what prompted the first time Uncle Nick burned him with a cigarette but he does recall that this went on for some time. Troy said that he was scared to say anything to anyone because somehow he "felt that he must deserve it for some reason". Troy also recalls a time when Aunt Verda and Uncle Nick left him and Clyde with a babysitter. He remembers being told by the babysitter that she saw a "guy with a mask looking through the window" and thought he was a burglar so they needed to go into the closet until she could make sure that everything was okay. The babysitter handed them a butter knife and locked them in a closet. Troy remembers he and his brother being so scared that they sat there with the knife for what seemed like an eternity. After several hours they tried to get out of the closet but it was locked. The boys had to go the bathroom in the closet and then sit there in it until the following morning when the babysitter returned and let them out. She claimed to have forgotten they were in there and began to laugh. The boys would later find out that the babysitter locked them in the closet so that she could have her boyfriend over to spend the night.

It was shortly after this incidence that Troy noticed that he was feeling “on edge a lot”. He had several cousins living in the area that were older and they would eventually introduce Troy and his brother to their first experience with mind-altering substances. Troy and Clyde would begin experimenting with “huffing”. This would include gas, paint, and anything else the cousins could find. Troy remembers Clyde really enjoying this activity but it began to make Troy sick so he quit. During this time, Troy was barely seven years old.

Later that year Troy’s mother would appear for a visit with her boyfriend Holbert. Troy remembers seeing mom “either drunk or high most of the time”. This particular memory brought tears to Troy’s eyes just recalling the incident, even some thirty years later. Troy wasn’t sure what prompted the fight between mom and Holbert because they had only been there for a short time. He does however, remember seeing Holbert grab his “little green chair” and striking his mother over the head with it. He vividly recalls the blood running down her face and the look on her face when she realized that Troy had observed the whole incident. Cleta never bothered to explain what happened she just cleaned up and “kept her mouth shut”. This would be one of many violent exchanges Troy and his brother would observe and experience over the years.

Cleta and Holbert had a volatile relationship. The times when Cleta and Holbert would present themselves in the lives of Troy and Clyde, they were often on the run from the law and under the influence of drugs and alcohol. Holbert was a strict disciplinarian who would drink to excess, which often led to unpredictable violence primarily directed toward Cleta but at times in cruel acts directed toward the children. Not surprisingly, the violence and substance abuse present in Troy’s childhood homes was mirrored in the following generations. Cleta’s siblings were ill equipped to provide positive parenting and most turned to alcohol as a means to escape from the environment of poverty. Unconcerned about children observing their negative behavior, adults gambled, stole, involved themselves in prostitution and used drugs regardless of the audience.

At the end of Troy's third grad year, grandma Rosella would take the kids to Oklahoma where they would begin working on strawberry farms. Troy remembers his childhood being a hard one. They would often wake at four in the morning to work the farm and pick whatever fruit was being grown. They spent the summers traveling the country working neighboring farms to supplement family income. Troy remembers that at times grandma would leave them with strangers and come back for them months later when the "season was over". The expectation of work at young age to help support the family was brought from the previous generations. Children saw little more than hardship as reward for their work in the field's that started as soon as they got up to any size at all. Over the years they would pick fruit and cotton. Troy remembers that at some farms, especially the cotton, that at times he and his brother would have trouble breathing. At one time it was common practice to use DDT to prevent insect infestation in cotton crops, which could have been the reasoning behind the difficulty breathing.

After spending the summer picking strawberries, the family found themselves in Canton, Texas in 1975. Troy was eight years old and about to enter the fourth grade. This is where Troy would have his first set of surgeries to deal with not only his cleft but also the constant ear infections that he suffered. Ear infections are a very common problem associated with clefts and even though Troy remembers times when his ears hurt so bad and often bled, grandma would never take him to the doctor. What grandma didn't know was that ear infections are a result of poor drainage. Poor drainage leads to a build up of fluid. When bacteria grow in that fluid, then an infections occurs. If there is no release the infection will burst – either out the eardrum, or into the brain. If untreated, it could lead to potentially long term hearing problems or even sometimes death.

Troy doesn't remember why he was suddenly taken to the hospital for surgery but remembers staying in Canton for only a short time after his surgery. He would not complete a full year of school there and it was suspected that the lack of medical attention he had received over the years prompted the hospital to contact Child Protective Services. This could be why the family moved again so quickly.

In 1975, the family moved to Fresno California. Aunt Verda and Uncle Buddy lived there and could help the family find work. Cleta and Holbert had moved to California as well and were now involved in crime and drug dealing. Troy was nine years old and beginning the fifth grade. He would experience some of the most devastating memories recalled there.

In all the years of moving from town to town, Troy and his brother had lived in places where housing codes were not enforced and many members of the same family crowded into inexpensive, unsafe housing. Most of the time the plumbing did not work, windows were broken and vermin were uncontrolled. This move would have them living out of the back of a truck with a camper on top. Troy remembers the truck staying at a campsite. They would use the woods for bathrooms, the fire to cook and their "imagination" for entertainment. Clyde would often fish out of the creeks for food to eat and Troy would search the banks of the rivers for hooks in order to help Clyde get more to eat.

Troy befriended a small girl that attended school with him and lived near the campsite. He recalls that one-day after school he was watching from the back of the truck when he noticed several boys "picking on her". He thought about going to help her but then he saw them grab pencils and begin to stab her. He said he had "never been so scared watching them stab her like that". The little girl died from the injuries right before Troy's eyes. He couldn't say anything because he remembered grandma telling him a young age, "you keep to your self, stay out of other people's business and NEVER tell on anyone!" Troy had great emotional difficulty recalling the story and had to stop several times because he was overcome emotion. Troy learned that brutal violence was a way of life from which no one was safe.

When he wasn't in school, Troy and Clyde would help the family sack onions. Later they would be told by Cleta and Holbert to help "bag some medicine" for them. This would turn out to be bags of speed that Cleta would later sell. Troy remembers sacking 50 to 100 bags a sitting. Holbert would also use Troy and Clyde to help steal copper wire off the electrical lines. Holbert would have Clyde or "some hitchhikers" he would recruit to

climb the electrical lines and cut the copper wire off. Then Troy and Clyde would be in charge of rolling the copper wire up so that Holbert could sell it on the black-market. After a few sales, some people wouldn't buy it rolled up so Troy and Clyde would have to cut the wire in strips and bundle. Troy remembers his hands being blistered and bleeding from cutting the wire.

It was during this time when Troy found a puppy. Cleta had given him permission to keep it if he took care of it. After witnessing the death of a school friend, this puppy became something "safe for him" to express emotions with. Troy took very good care of the dog. That might have been the reason why Holbert took an immediate dislike for the dog. Holbert felt Troy was spending too much with the dog and not enough helping out (with criminal activity). One day Troy came home from school and began playing with his dog. He had noticed that Holbert and Cleta were drinking and so he knew to get the dog and "stay out of the way". However something made Holbert angry and he grabbed a hold of the puppy's hind legs. He looked at Troy and Troy began to cry. Holbert then slammed the dog against concrete several times killing it then threw the dog on Troy. Holbert said, "Crying is for sissies". Troy recalls that was the last time he ever allowed anyone to see him cry. Troy also recalls looking at his mother just stand there, not saying a word. He couldn't understand "why she wouldn't do anything, she was the one who gave him permission to have the dog anyway". When recalling the story, Troy asked to be excused because he became visibly upset verbalizing the incident. He still didn't want anyone seeing him cry. Troy said that Holbert killed another one of his dogs later but could not bring himself to discuss it.

The following year, in 1977, grandma moved the kids to Pinedale California. Cleta and Holbert were on their way to Texas to deliver drugs and so the kids were once again left with family. Troy was ten years old and starting sixth grade. He recalls that this was the year he attended his first concert, KISS. He was allowed to go with his brother and some older cousins. His cousins were already using drugs and alcohol and were well know to the police. Although Troy had been exposed to drugs and alcohol much earlier, it was not until his move to Pinedale that drugs and alcohol became easily accessible and he began

to use regularly. As Troy's cousins became older and their drug use increased so did their need for money and the severity of their crimes to support the habit. It should be noted that from this point on in Troy's life, drugs and alcohol would play a major part and his memories of these years would be impaired as a result.

In the middle of Troy's sixth grade year, grandma moved the kids to Lubbock for work and because Uncle T.W. (Rosella's son) and his wife Helen lived there with their eleven children. Troy recalls Helen "being an evil woman". She would often subject Troy to ridicule and harassment about his cleft and speech problems. The home environment was crowded. Children would often share beds, couches and sometimes floors. There was no privacy, no quiet and no place to be alone. Troy remembers sometimes just walking the neighborhood "to get away from the chaos". Aunt Edna and Uncle Buddy had just recently moved to the area and Troy remembers Uncle Buddy being as evil if not more so than Aunt Helen. The only difference was that Buddy drank all the time.

With T.W. and Helen having so many children, Troy and Clyde would often be sent to Edna and Buddy's home. Troy said that he was never sure why Buddy began to hit him but thinks it had something to do with Troy having an argument with one of Buddy's daughters. Troy recalls that after this happened Buddy began to hit him. It wasn't just slaps on the hands, "Buddy would hit me with his fists all over". Troy would tell himself that the reason why his family was so mean to him was because "he was grandma's favorite" and "that made them mad". Troy was never able to understand that his family suffered from mental illness and substance abuse and it was never about "him" but he spent his entire life believing it was. Violence seemed the only constant in Troy's life and his substance use increased as he attempted to deal with his unpredictable environment.

In 1979 at the age of twelve, the family would make another move, this time to Granbury, Texas. Troy remembers staying with his cousin James and he and Clyde would help work oilrigs near Granbury Lake. Troy would enroll in Granbury Middle School and remembers getting into a fight on the first day of school because one of the kids made fun of him for having long hair. Troy was expelled and missed several days of school after

his return because he always felt like “people were picking on him”. He thought they were making fun of him because he was poor. Shortly after the school year began Clyde got into an argument with Aunt Helen and left for California in hope of finding Cleta. This was the first time Troy was left alone without his brother. Clyde had become Troy’s father figure and he was the one constant person in his life. Troy recalls thinking that he wouldn’t last without him. One of Cleta’s friends who prostituted with her, “Green Eyes”, tried to convince Troy to leave with her and she would take care of him. She seduced him hoping that having sex with him would convince him to go. Troy decided instead to withdraw from middle school and hitchhike his way to California to reunite with his brother and hopefully his mother.

Once Troy arrived in California he and Clyde would “work the farms” to get by. Once they were able to locate Cleta and she realized that they were already involved in drug use, she introduced them to speed, methamphetamine, cocaine and crack. It would not take long for Troy to see the financial opportunity available in becoming a dealer. At the mere age of thirteen, he began selling speed and marijuana. It didn’t take long for the local enforcement to catch on to their drug activities so they left for Texas.

Troy and Clyde arrived in La Porte, just outside of Houston and stayed with some cousins who helped them find odd jobs. Even though Troy wasn’t old enough to legally work, he would use Clyde’s social security number to get around it. Cleta eventually made her way to town and continued her prostitution out of a local truck stop and was living in a local motel. It was there that Troy and Clyde began having sex with other women, “friends of my mom’s” and began to drink more regular. It is unclear how long they stayed in La Porte but over the next year or so they shuffled from La Porte to Sweetwater to Mineral Wells. Cleta had left town and the boys were unsure where she was so they headed for California to get her. Even though Cleta spent the majority of their childhood incarcerated, the boys still felt the need to protect and watch over her.

While searching for Cleta in California, Troy and Clyde would live in a small travel trailer that one of the family members kept. Now that Troy was making money, selling

drugs, he and Clyde didn't have to scrounge for food. Even though they were unable to locate Cleta, she had "hooked him up with a drug dealer" in California so they loaded up some more drugs and headed back for Texas. This time Troy and Clyde ended up in Gilmore, Texas. Cousin James lived there and helped the boys get a job with CI Construction remodeling homes. James was the local "dope dealer in the trailer park" so Troy was able to sell speed and marijuana without interfering with his cousin's "territory". This would be where Troy would have his first brush with the law. He was arrested for stealing gasoline. He was released (but charged) when he told the police that he "had stolen for it for his parents".

Clyde had purchased a service truck and the construction business eventually became slow so he and Troy headed to Houston to work with another cousin who owned a trucking tire business. Troy would fix and repair truck tires and Clyde would make service calls. The two remained in Houston for quite a while. Troy would get his second arrest for possession of marijuana. He would however, meet his future wife, Marla Morrison. She was from a wealthy local family and Troy recalls meeting her because there were a group of local girls "that would have sex with anyone". Marla was apparently at a friend's house with a few of her girlfriends having sex with several men. She asked Troy to have sex with her and as Troy explains, "the rest was history". Troy and Marla began dating and it was only then that Troy learned of Marla's family finances. He recalls going to her house for the first time and "being blown away" by the size of it. Troy had spent most of his life either living in trailers, cars, campsites or overcrowded shacks. Marla offered something to him he had never had before, acceptance.

Marla's family was accepting of Troy but some became aware that they were sexually active. Marla's father, Dana Morrison, told them that they couldn't have sex unless they were married. I believe Marla suffered a miscarriage. As a result, along with the fact that Child Protective Services was threatening to send Troy to a foster home, Marla and Troy were married October 20, 1984. It was also the year that Troy would briefly meet his "father" and grandfather at a local gas station that his grandfather owned. Troy had hoped

to form a bond with his father but it proved to be short lived. Troy remembers it being a "brief encounter that didn't amount to much". After Troy got married, Clyde returned to Oregon to be with family.

Later that same year, Troy would be arrested for theft. He would later be released but this would be the beginning of several incarcerations for Troy over the next few years. The legal trouble for Troy would be the beginning of the end for he and Marla. He would leave Texas to return to Oregon to be his brother but would be returned to Texas by Texas-Rangers, for an investigation of murder. He would remain in custody for three months before being released after the Grand Jury "no billed". Troy was still using substances daily and as a result in 1986 he would be arrested for possession of a controlled substance (cocaine) and was sentenced to 2 years in TDCJ. He would be paroled after serving three months and would try to rekindle the marriage with Marla.

It was during this time that Troy began to realize that even though he had been arrested for drug possession, the drugs were bringing him something he had never had growing up: attention from others. He noticed that women wanted to be around him, not realizing they just wanted drugs. Troy saw this, as he was finally being accepted and sought after by women. He remember feeling a "sense of power" that he had never felt and knew that he would be unable to stop. He just had to be more cautious. On Parole from the cocaine charge, his probation was revoked and he was sent to Halfway House In Houston in order to get court ordered drug treatment. This could have been a turning point for Troy had he taken the help and used it. However, he was kicked out of the program within three months because he was caught with alcohol (an obvious sign that his addiction was not under control). In June of 1987, he was sent to TDCJ and served his time at the Jester II Unit in Brazoria County. He was released on Parole June 1, 1989

It is not certain when Troy's first son was conceived but Troy states that when he was promoted to "trustee status" Marla "was able to get pregnant" and delivered their first child, Justin, on June 10, 1988. Though Troy and Marla remained married, both would have sexual partners outside of the marriage.

In 1989 Troy moved to Kilgore Texas where he continued to sell drugs and use on a daily basis. He was becoming more frustrated with life and moved back to Oregon where he got a job and started dating, though he was still married to Marla. He met a girl named Bonnie. The relationship wouldn't last long and when Troy asked Clyde to take her home one night, as Troy remembers, "that was all she wrote". From that point on Clyde and Bonnie would be together eventually becoming married and having several children. Troy would meet a friend of the family named Tory and they would begin a relationship that would be interrupted by another move to Texas for a short time. While Troy remained in Oregon, he was arrested for several offenses and as was his pattern, once he got in trouble with the law he would flee. He would return to Texas long enough to get Marla pregnant with their second child and after Amy was born on March 5, 1991 he would then return back to Oregon for what would be the most devastating event of Troy's life.

It was December 1992 and Troy was living with Tory and a few friends in Oregon. He and Marla had officially divorced that year and he was trying to start over. One afternoon his brother Clyde had come by for some crank. Troy tried to tell Clyde that he didn't have any but Clyde had been drinking heavily, which he had been doing quite regularly of late. When Clyde wouldn't take no for an answer, he slammed the front door and broke the glass so he and Troy began to fight in the front yard. Through the years of all the trials and tribulations, Troy and Clyde had never physically fought one another but here they were. After several minutes, Clyde got up and left. The following day Clyde would call and tell Troy that if he came by later, he would give him money for the broken glass. He went on to say that it didn't really matter because he was "going to kill himself anyway". Troy remembers telling him "Don't talk like that, that's stupid". Troy knew that Clyde had become increasingly depressed lately and that his drinking had become a problem. Troy just thought it was the "hangover talking" and didn't think anything about it. The following day Troy was about to leave for Clyde's house when the phone rang.

Treva, his father's new wife, was on the other end of the phone and said; "Get over to Clyde's house now". Troy went immediately and when he arrived he said that his stepbrother Chuck, stepsister Sharmie, Treva and his father were all there in the front yard. All he remembers is hearing them say, "He's gone, Clyde's gone". At first Troy said he thought they meant he had left but then Treva told him that Clyde had shot himself while he was on the phone with Bonnie. Troy said he was in such shock that he just left. He went home, found his gun and put it in his mouth and pulled the trigger. Troy said the gun jammed and he became so frustrated that he left. He went to a local bar and grabbed a friend to take him back to Clyde's house. When he arrived he tried to go in to make sure it was real but the family wouldn't allow it. Troy describes this time of his life as the "beginning of the end".

After Clyde's death, Troy would be arrested in Oregon for a DUI and assault, which he blames on the daily drinking in an attempt to cope with Clyde's death. He would then get on Clyde's motorcycle and begin a several month long journey from Oregon to California to Texas and somehow ended up at the Grand Canyon. He had been smoking marijuana and drinking all day and had decided that he would drive the motorcycle off the Grand Canyon so that he "could be with Clyde". He ended up passing out and woke the next morning lying next to a wrecked bike. He's not sure if he tried or not but decided to go ahead and return to Texas to be with his children.

In 1993, he moved to East Texas where Marla and the kids had relocated with her parents. His mother, Cleta had relocated to the area as well but would frequently take trips to California in order to keep her drug business going. One afternoon the local police came by the house looking for Cleta but she wasn't there. The police located methamphetamine in the home and asked whom it belonged to. Troy said that without thinking he told the police was his. He had always been taught to "never nark" and he and his mother were just beginning to build a relationship again, plus she was headed to California for more drugs. He was arrested for possession of a controlled substance and sentenced to eighteen years. Troy recalls that once his mother returned from California,

she was arrested and sentenced as well so had he known she was going to be arrested anyway, he would have never taken the fall for her.

In January of 1993, Troy arrived at the Clemens Unit to begin his sentence. The following month on February 26th, three inmates wearing steel toe boots assaulted Troy. He was taken to Angleton Danbury Emergency Room where he was treated for "Severe Head Trauma". He suffered:

"L eye swollen shut with bruising; R eye swollen; R forehead swollen and bruised; abrasion with swelling to the back of the head; abrasion to the R side of the head; severe swelling and bruising L ear with active bleeding inside the ear; possible broken nose, difficulty breathing"

Troy recalls this being a very hard time for him. He wasn't sure he would make it and considered suicide at one point. There would be another assault against Troy on March 9th, but records do not indicate the incident in detail. During his stay at TDCJ, Troy would not only complete his GED, he would successfully complete over fifty classes with the Windham School District, including a cluster of classes in Heating, Ventilation and Air Conditioning. He would be paroled to Smith County in February 1996.

Once Troy returned to East Texas, he originally began using the skills he had acquired in prison. He worked odd jobs doing heating/air conditioning and began a tattoo shop out of his house. It wasn't too long before Troy's life-long battle with addiction returned. He also realized that selling drugs was producing much better money than working a "normal job" so he returned to what he knew best. Not long after his return, Troy states that his daughter Amy had revealed to him that her grandfather (Marla's dad) had molested her. Troy knew that he needed to stay out of trouble since he was on parole so he did what he thought was the right thing, he called child protective services to investigate. Troy remembers Marla telling him that her father molested her as a child and he didn't want to have to "take care of things" him self. The file was later closed after Troy's arrest.

Tory was living with Troy in a fairly nice home in Tyler and things appeared to be going well. He had occasional contact with his father, stepmother and stepsiblings and even though his mother was still incarcerated, he had occasional contact with her as well. One afternoon in 1998 Troy recalls coming home when Tory approached him at the door and said that something bad had happened. Tory said that she had killed a lady and needed Troy to help her do something with the body. Troy recalls not even thinking twice because you "never nark on anyone". In retrospect, he feels that had he went to authorities things would have ended differently. Troy was arrested on October 7th, 1998 and charged with Capital Murder. Troy's stepbrother Chuck recalls that shortly after Troy was arrested she phoned him and said, "They've arrested Troy and I did it, Troy didn't have anything to do with it, what should I do?" This information was never presented at his trial.

Post Conviction

Once Troy arrived on Death Row March 31, 2000 he realized the magnitude of "covering for Tory" and tried to commit suicide by slicing his both wrists. Staff discovered him at 1530 on 04/01/00 soaked in blood. He was taken to the medical unit and his cuts were sutured. He was then transported to the Jester Unit where he remained for several months undergoing psychiatric treatment. Over the next several months Troy reported difficulty concentrating, decrease memory, had occasional suicidal thoughts and reported stating to staff "I can't handle this". These are all classical symptoms of depression. He even reported hearing "voices of his brother". Troy was treated with antidepressants and then returned to death row where he has remained.

Troy has shown his ability to do well in a structured environment provided by all aspects of the penal system. During his incarceration, Troy has been without restrictions. He has also been successful at leading a clean and sober lifestyle while incarcerated. This is something he has been unable to do on his own in the past. He has maintained a satisfactory adjustment to incarceration. He has not engaged in violent, assaultive, or

disruptive behavior. In an environment of rigid structure, Troy has shown that he responds well and can be extremely successful.

Conclusions

Environmental factors interacted with biological factors to result in Troy's personality and character formation. Despite a long family history of some success in the face of adversity, Troy's family could not protect him from the consequences of living in chronic danger, chaos and instability. Due to her own mental and emotional impairments, Troy's mother was unable to understand and meet her childrearing responsibilities. Those she left this task to while incarcerated, were also not able to handle the tremendous responsibility.

Troy was born into extreme rural poverty. Traditional medical care was not available and Troy's family depended on government assistance and family kindness to maintain a home and keep food on the table. Troy lived in substandard and unsafe housing with no adult supervision. Troy and his cousins were inadequately clothed, malnourished and without access to medical care. Although Troy was born with a cleft palate, it would not be surgically corrected for many years. As a result, Troy would suffer great ridicule and harassment throughout his early childhood. Chronic ear infections were met without medical care, which ultimately resulted in Troy being deaf in both ears. He now requires hearing aids in both ears.

Every sphere of Troy's life was affected by family dynamics, poverty, mental illness, violence and substance abuse. Troy's ability to overcome overwhelming obstacles in order to attain successful and healthy development was depleted by extremely debilitating circumstances over which he had no control. The systems in the human brain that allow us to form and maintain emotional relationships develop during infancy and the first years of life. Experiences during this early vulnerable period of life are critical to shaping the capacity to form intimate and emotionally healthy relationships. Empathy, caring, sharing, inhibition of aggression and capacity to love are related to the core

attachments formed in infancy and early childhood. During Troy's infancy, his father abandoned the family and mother began using drugs and alcohol on a regular basis, which led to her incarceration. This resulted in Troy's mother being unable to provide the proper bonding and attachment needed for Troy's emotional development. Poor attachment with mother or primary caregiver appears to be associated with a host of emotional and behavioral problems later in life.

Environmental factors interacted with biological factors to result in Troy's personality and character formation. Troy had poor parental involvement as a child and although he experienced some successes as a child, his family could not protect him from the consequences of living in chaos, poverty and instability.

Poverty is harmful to the physical, socioemotional, and cognitive well being of children, youths and their families. They suffer greater turmoil, violence, and separation of their parents. Their parents are more nonresponsive and harsh, and they live in chaotic households, with fewer routines, less structure, and greater instability.

Troy was born and reared in a family with an extensive, multigenerational history of substance abuse, mental illness and interpersonal violence that affected his development and functioning in every major life sphere. Surrogate families exhibited the same characteristics, unable to provide the stability he needed. His orientation to the world around him, ability to develop his potential, and capacity to understand, relate and respond rationally, logically and appropriately to events were shaped and influenced by family dynamics that reflected genetic vulnerability and patterns of severely dysfunctional behavior that were transmitted from one generation to the next. His emotional, psychological and intellectual development was compromised by factors over which he had no control. Troy lived in an atmosphere of chronic violence where despite good intentions he was unable to protect those that he loved. Troy responded to his experiences in the world with fear, stress, sadness and like other children who witness violence he experienced heightened anxiety, loss of self-esteem and despair.

Troy developed a set of conscious and unconscious behaviors commonly associated with surviving chronic maltreatment and exposure to violence. Troy was betrayed by his father's abandonment and victimized by his mother's inability and failure to provide the proper maternal-child attachment. The most common effect children experience from this type of maltreatment is to feel rejected. Children that are rejected by their parents will have a host of problems including difficulty in developing emotional intimacy. A range of emotional problems is also common in these children including depressive and anxiety symptoms. Children model adult behavior – *even if it is abusive*- so for these families, it is common for this rejection and maltreatment to be transgenerational.

Troy's ability to learn how to function within either family or community was further eroded by abandonment by significant people and attachment figures spanning critical developmental phases. During his early childhood he was constantly aware of his father's abandonment. With each move to a new home and neighborhood, any positive role model in Troy's life was left behind. Often left to fend for himself at a young age Troy depended on the kindness and generosity of a variety of individuals who had varied levels of interest in him and were themselves plagued by family problems of drug abuse and violence.

Troy aged with little in the way of resources or coping mechanisms to contain or modulate his psychiatric symptomatology. Troy followed the lead of older peers and family members and began using alcohol and drugs, which he found alleviated the acute and long-term consequences of his victimization and trauma. Given the excessive history of alcoholism that spanned three generations his polysubstance abuse most likely had a significant genetic component as well as learned or modeled pathogenesis. Troy's concurrent abuse of alcohol and street drugs is consistent with an effort to self-medicate a number of symptoms that frequently follow chronic exposure to violence and maltreatment. These symptoms exacerbated rapidly after the suicide of his brother Clyde. Clyde was the only thing "that held him together" family said.

The ability of the **brain to compensate**, over time for damage, according to medical assessment, **depends upon genetic capability, environmental stimulation, overall health and minimal psychological stressors**. Troy's ability to compensate was impeded by environmental **exposure to poverty and a high level of exposure to psychological stressors** including domestic and community violence **and trauma**.

Chronic exposure to violence and trauma can have **profound effects on the development** of a child. It affects the child's sense of safety, **security and ability to grow into an emotionally healthy adult**. The effects are enhanced **when the child is not only in danger** in the community, but in his or her own home. **Parents cannot be viewed as providing safety for the child** if they are also inflictors of violence or **choose to allow violence at the hands of another adult**. A child who witnesses the abuse of his mother and/or siblings develops feelings of guilt, helplessness, powerlessness and low self-esteem. In order to develop into an emotionally healthy adult, a child needs basic physical and emotional needs met. He or she needs predictability, guidance with clear and consistent limits, positive modeling, opportunities to develop a positive sense of self, and to feel **safe and secure**. Troy did receive some of these things in his house: he did receive love and basic physical needs from his grandmother but his grandmother was often absent due to other demands. He did not have any emotional support from his father, nor did he have positive role modeling, predictability and consistency in his home.

Children who experience or witness domestic violence tends to suffer from a variety of mental health symptoms or trauma reactions as a result. Exposure impacts the child's development and can negatively impact cognition, including memory and school performance. Chronic trauma also affects personality development and behavior and can lead to decreased impulse control. The context in which the child experiences the trauma is also important. An environment of poverty and family disruption compounds reaction. Among the risk factors that enhance the likelihood of adverse effects, including psychiatric disorders, are marital distress, low socio-economic status, and substance abuse. All of these factors can be found in Troy's history.

There are some factors or conditions that enhance a child's resiliency and ability to cope with chronic trauma. Ameliorating factors include cognitive competence, experiences of self-efficacy, positive early relationships, self-confidence and self-esteem, community support and encouragement and role models for active coping strategies. Protective factors include a stable emotional relationship with at least one parent or significant other, an open and supportive educational climate, parental modeling of behavior that encourages constructive coping and social supports outside the family.

Troy exhibits some of the behavioral indicators of children who have been abused and/or who were exposed to violence and trauma. These include low self-esteem, difficulty expressing feelings, possible mental illness and substance abuse. The trauma disrupted his normal development and prevented him from learning vital lessons of life that childhood is intended to provide. He responded to the trauma in a manner commonly seen in other children who have faced daily annihilation at the hands of their caretakers. He became hyper vigilant, ever alert to unpredictable danger, and stayed in a constant state of arousal. He learned to use drugs, alcohol and organic solvents to quell these frightening emotions. The array of symptoms Troy displayed in response to childhood trauma is diagnostic of Post Traumatic Stress Disorder (PTSD).

In spite of his drug addiction and home life, Troy did demonstrate some positive qualities and responsible behavior in certain aspects of his life. Troy took on household responsibilities including cooking, cleaning and assisting the family with other siblings. He also contributed income to the family by way of working the fields or whatever was asked of him.

Not all children who experience a variety of maltreatment as Troy did or who come from dysfunctional families grow up to be behaviorally or emotionally disturbed or involved in the criminal justice system. Those who manage to escape pathologic psychological outcomes often have protective factors in their life that shield or mitigate the effects of their developmental environment. Research has identified a crucial constellation of such factors that can buffer or protect children who grow up in chaotic dysfunctional families

from developing pathologic outcomes. These include a consistent supportive environment that reinforces the child's coping skills, positive peer relationships, and most importantly a positive and meaningful relationship with significant adults other than the abusers. After suffering most of his life from violence and maltreatment it does not appear that any of these positive factors have been present in Troy's life to any meaningful degree. To the contrary, negative factors such as psychiatric illness, genetic vulnerability, polysubstance abuse, and interpersonal violence reacted synergistically to intensify his impairment. Troy's addiction increased dramatically because of his family's economic conditions, cultural traditions, formal and informal social controls, and the companionship, approval and encouragement of other drug, alcohol, and organic solvent users. Drugs, alcohol, and organic solvents were made available to him at an early age in sufficient amounts to cause addiction by those who should have protected him from harm.

I understand that in determining charges, the reviewer may consider as mitigating evidence that the offense was committed while the defendant was under the influence of mental and emotional disturbance, that the defendant's capacity to appreciate the criminality of his conduct or to conform his conduct to the requirements of law was impaired as a result of mental disease or defect, or the effects of intoxication and any sympathetic or other aspect of Troy's character or record including any developmental or mental disability that affected Troy, whether or not it was a causal factor in the commission of the crime.

Having been asked to investigate Troy's life and family history, I have prepared this social history, which indicates the existence of each of these factors, which in my opinion resulted from both domestic and interpersonal violence he either witnessed or experienced, a genetic predisposition to substance abuse, a genetic predisposition to mental illness and other developmental factors beyond his control.

I declare under the penalty of perjury under the law of the state of Texas that the foregoing is true and correct, and was executed the 28th day of August 2004.

Shelli S. Schade, LMSW, DAPA

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APPENDIX

The following Appendix is a list of documents and interviews used in preparing the Declaration of Shelli S. Schade, LMSW, DAPA

Troy J. Clark
Cleta Barrington
Chuck Clark
Sharmie Clark
Justin Clark
Wilburn Clark
Attorney Craig Henry
Attorney Bobby Mims
Paralegal Melinda Young
Attorney Jeff Haas
Texas Department of Criminal Justice Institutional Division File, #999351
TDCJ Medical Records
TDCJ Psychiatric Records
Gregg County Criminal Records
Smith County Criminal Records
Harris County Criminal Records
Umatilla, Oregon County Criminal Records
TDPRS Records
Windham School District Records
Legal transcripts from trial
Polunsky Unit TDCJ File, #999351
Family Photos, memorabilia
Employment Records
Correspondence from family members, which wish to remain anonymous